FILED

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS DEL RIO DIVISION

OCT 31 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY DEPUTY CLERK

UNITED STATES OF AMERICA

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CAUSE NO.: DR24-2118M

IRINA ZHAVORONKOVA

VS.

STIPULATION OF FACTS

The United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant U.S. Attorney, the Defendant, and Defense counsel hereby stipulate that if this matter were to proceed to trial, the United States would establish by legal and competent evidence the following facts beyond a reasonable doubt:

On July 22, 2024, IRINA ZHAVORONKOVA (Herein after "Defendant") unlawfully entered or attempted to enter the United States near Eagle Pass, Texas within the Western District of Texas, at a time and place other than that designated by United States immigration officials for the entrance of immigrants into the United States. The Defendant is an alien and citizen of RUSSIA, The Defendant committed all of the foregoing acts knowingly and voluntarily with the specific intent to violate the law.

Respectfully submitted,

JAIME ESPARZA United States Attorney

By:

OSHUA B. BANISTER

Assistant United States Attorney

After consulting with my attorney, I hereby stipulate the above Statement of Facts is true and accurate, and had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt. I accept responsibility for my actions in this case and apologize for having committed this offense.

Signed this <u>04</u> day of <u>october</u>, 2024.

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	IRINA ZHAVORONKOVA Defermant
I an	n Defendant's Attorney, I have carefully reviewed the above Stipulation of Facts with
the Defenda	ant. To my knowledge, Defendant's decision to stipulate to such facts is informed and
voluntary.	
Sigr	ned this day of
	EDGARDO RAFAEL BAEZ
	Defendant's Attorney
Ado	pted and approved this 31th day of 01 File , 2024.
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Chief United States District Judge